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**UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING**

STATE OF WYOMING, et al.,)	2:15-CV-00043-SWS [Lead]
)	
Petitioners,)	[Consolidated With 2:15-CV-00041]
v.)	
)	Assigned: Hon. Scott W. Skavdahl
UNITED STATES DEPARTMENT OF)	
THE INTERIOR, et al.)	
)	
Respondents,)	
)	RESPONDENT-INTERVENORS'
SIERRA CLUB, et al.,)	MOTION FOR FINAL JUDGMENT OR
)	STAY OF DISTRICT COURT
Respondent-Intervenors.)	PROCEEDINGS PENDING APPEAL

For the reasons stated in the attached brief, Respondent-Intervenors (collectively the “Citizen Groups”) respectfully request that the Court consolidate its September 30 Order on Motions for Preliminary Injunction (Dkt #130) (the “September 30 Order” or “Preliminary Injunction Order”) with a final judgment on the merits. Alternatively, the Citizen Groups respectfully move the Court to stay proceedings in this case pending resolution in the Tenth Circuit of an appeal of the Court’s Preliminary Injunction Order.

The Citizen Groups have conferred with counsel for Petitioners, and counsel for the Federal Respondents (“BLM”). BLM takes no position on the request that the September 30 Order be consolidated with a final judgment on the merits. Counsel for BLM indicated that the agency is still deliberating, but will likely oppose the alternative request for a stay pending appeal. Petitioners Wyoming, Colorado, Independent Petroleum Association of America, and Western Energy Alliance, and Petitioner-Intervenors North Dakota and Utah, oppose this motion. On Friday, November 13, counsel for the Citizen Groups conferred by telephone with counsel for Petitioner-Intervenor Ute Indian Tribe and the tribe has not yet taken a position on this motion.

A brief in support of this motion, along with two proposed orders addressing the alternative forms of requested relief, are attached.

Dated: November 16, 2015

s/Michael S. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November 2015, a copy of the foregoing **RESPONDENT-INTERVENORS' MOTION FOR FINAL JUDGMENT OR STAY OF DISTRICT COURT PROCEEDINGS PENDING APPEAL** was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Michael S. Freeman